

cards.⁴² This is not the case. Line-number cards confer no special advantage, especially when compared to the benefits interexchange carriers can offer through their proprietary cards. If anything, it is the exchange carrier cards, line number or not, that are at a disadvantage because they do not offer callers discounts on their interLATA calls.

Consumers do not especially care if their cards are based on their telephone numbers. In a 1992 study, 65 percent of the people surveyed said they had little or no concern if their calling card number was not based on their telephone number.⁴³ In contrast, callers say that they are willing to undertake a little extra effort if they can get a discount on their calls.⁴⁴

Commercial credit cards. Bell Atlantic does not object to a billed party preference plan that accommodates commercial credit cards, as long as the validation databases meet the network response standards specified for carrier LIDB and CIID validation databases.

Dialing plan. The Notice states that no changes to the national dialing plan are necessary to accommodate billed party preference.⁴⁵ This is not correct. Today, consumers use 00- to reach the carrier to which the line is presubscribed, the 1+ and

⁴² Further Notice at ¶ 71.

⁴³ FCB/LGK Research Dep't, Calling Card Segmentation Study Phase III (Feb. 1992).

⁴⁴ *Id.*

⁴⁵ Further Notice at 7 n.15.

0+ carrier. With billed party preference and the possibility of two interLATA carriers for every line, the dialing plan would have to be changed to give consumers an easy way to reach their 1+ and their 0+ carrier. Therefore, if 00- would still reach the caller's 1+ carrier, some other code -- perhaps 000- -- would have to be established for the 0- provider.

Timing. It is unrealistic to believe that the industry could implement billed party preference within 30 months of a final order from the Commission.⁴⁶ That order would, hopefully, finally resolve the differences within the industry about the definition of the service; however, it is likely that it would still leave details for the industry to work out. At that point, the carriers, both exchange and interexchange, could develop the specifications they need to take to their equipment manufacturers. Depending on what the Commission's final order says, that specification process could take from several months to a year and a half. The manufacturers would have to develop new systems, a process that typically takes 18 to 24 months. The new software would have to be tested and installed in thousands of switches nationwide. Hundreds of carriers at the same time will be making, often conflicting, demands for the new capabilities of the limited number of suppliers.

But that is not all. Each exchange carrier would have to reconfigure its network to send all 0+ calls to its operator switches, including in many cases building additional facilities,

⁴⁶ Further Notice at ¶ 83.

and to re-direct 0+ traffic to those switches before final implementation of billed party preference.⁴⁷ Each carrier would also have to modify its internal systems for service order processing, billing and the like to accommodate billed party preference. This process would take a minimum of three years.

Conclusion

For all of these reasons, Bell Atlantic strongly urges the Commission not to require billed party preference.

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⁴⁷ Today, 0+ interLATA calls go to the interexchange carrier.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of Bell Atlantic" was served this 1st day of August, 1994, by first class mail, postage prepaid, on the parties on the attached list.

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